

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Tracie M. Chapman)	Case No. 19-10499
)	Chapter 13 Proceedings
Debtor.)	Judge Jessica E. Price Smith

**CHAPTER 13 TRUSTEE'S OBJECTION TO DEBTOR'S
MOTION TO MODIFY PRIOR TO CONFIRMATION**

Now comes **LAUREN A. HELBLING**, the duly appointed and qualified Standing Chapter 13 Trustee ("Trustee") herein, by and through counsel, and hereby objects to the Debtor's Motion to Modify Prior to Confirmation filed with this Court on April 9, 2019 (hereinafter "Debtor's Motion"). In support of her objection, the Trustee makes the following representations to the Court:

1. The Trustee's Objection to Confirmation filed with the Court on February 4, 2019 has not been resolved. Specifically, the following paragraphs are not resolved: 1) Plan Provision: The Debtor has completed the liquidation section of Part 5.1. This section should be blank; and 2) Other: The Debtor's budget contains income from a spouse, however, per the First Meeting of Creditors, the Debtor is now separated. The Debtor's budget does not support a plan payment without this income.
2. The Debtor's proposed plan does not comply with Section 1322(d) of the Bankruptcy Code as the plan will complete in over 60 months with the filed proof of claims.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to deny the Debtor's Motion for the reasons cited.

Respectfully submitted,

/S/ Holly Davala

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CERTIFICATE OF SERVICE

I certify that on April 17, 2019, a true and correct copy of Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Renee Heller, Attorney, on behalf of Debtor, at rhlegal@aol.com

And by regular U.S. mail, postage prepaid, on:

Tracie M. Chapman, Debtor at 17412 Invermere Avenue, Cleveland, OH 44128

/S/ Holly Davala

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